



October 15, 2021

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Christa McAuliffe Intermediate School PTO, Inc. v. Bill De Blasio, 18 CV11657 (ER)(OTW)

Your Honor:

I represent Plaintiffs in the above captioned action. I write to request a one-week extension in the summary judgment briefing schedule. Counsel for Defendants and Intervenors consent to this request.

Under the current schedule, Plaintiffs' response to Defendants' motion for summary judgment is due on November 12, while Defendants' reply is due by December 3. Plaintiffs request a one week extension of both dates. As counsel primarily responsible for drafting the response, I have been unable to devote significant attention to the matter due to intensive discovery, including depositions, currently ongoing in *Coalition for TJ v. Fairfax County School Board*, No. 1:21-cv-00296-CMH-JFA (E.D. Va.). The close of discovery in that case is October 29. Also, on the same day Defendants filed the previous extension request, the United States Court of Appeals for the Seventh Circuit scheduled argument for November 10 in *Pavlock v. Holcomb*, No. 21-1599, a case in which I am counsel of record for the Appellants. As a result, an extra week would greatly assist in permitting Plaintiffs to prepare a proper opposition brief in this case.

This is Plaintiffs' second request for an extension, with the first coming in conjunction with Defendants' September 13 request. For the same reasons stated in Defendants' September 13 letter, the proposed extension would not prejudice any party.

For the reasons stated, Plaintiffs respectfully request that the Court extend the summary judgment briefing schedule by one week, rendering Plaintiffs' response due on November 19 and Defendants' reply due on December 10.

Sincerely,

CHRISTOPHER M. KIESER*
Counsel for Plaintiffs

**Admitted Pro Hac Vice*